

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

TANGER MANAGEMENT, LLC; ) CIVIL ACTION NO. 1:20-CV-00874-RP  
TANGER COLUMBUS, LLC; and )  
TANGER HOUSTON, LLC, )  
)  
Plaintiffs and Counter Defendants, )  
)  
v. )  
)  
HAGGAR DIRECT, INC., and HAGGAR )  
CLOTHING CO., )  
)  
Defendants and Counterclaimants. )  
)  
)

## NOTICE OF SETTLEMENT

Plaintiffs and Counter Defendants and Defendants and Counterclaimants, by and through their undersigned counsel, respectfully notify the Court that they have reached an agreement in principle to resolve the matters in dispute in this litigation. The agreement is intended to, among other things, resolve the parties' respective claims and would obviate the need for discovery or other such proceedings. The parties are currently preparing written settlement documentation necessary to memorialize the agreement. Once the settlement is finalized, the parties intend to file a Notice of Dismissal pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). In the interim, the parties respectfully request that the Court stay further proceedings in this action and all pending deadlines pending the filing of the appropriate documents to dispose of this case. In the event that the parties are unable to finalize the settlement, they will file a notice with the Court advising of the same and requesting a status conference.

Dated: June 21, 2021

Respectfully submitted,

TROUTMAN PEPPER HAMILTON  
SANDERS LLP

/s/ Jeremy Heep

Jeremy Heep (*pro hac vice*)  
Courtney A. Munnings (*pro hac vice*)  
Karli Cozen (*pro hac vice*)  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103-2799  
Tel.: 215.981.4972  
Fax: 215.981.4750  
Email: jeremy.heep@troutman.com  
Email: courtney.munnings@troutman.com  
Email: Karli.cozen@troutman.com

BUTLER SNOW LLP

Eric J.R. Nichols  
State Bar No. 14994900  
Christopher Cowan  
State Bar No. 24084975  
1400 Lavaca Street, Suite 1000  
Austin, Texas 78701  
Tel: 737-802-1800  
Fax: 737-802-1801  
Email: eric.nichols@butlersnow.com  
Email: chris.cowan@butlersnow.com

*Attorneys for Defendants and Counter  
Claimants Haggar Direct, Inc. and Haggar  
Clothing Co.*

DENTONS US LLP

/s/ David M. Fedder

David M. Fedder  
(admitted pro hac vice/MO Bar No. 38823)  
One Metropolitan Square  
211 N. Broadway, Suite 3000  
St. Louis, MO 63102-2741  
Telephone: (314) 241 1800  
Facsimile: (314) 259 5959  
Email: david.fedder@dentons.com

Uchenna Ekuma-Nkama  
(admitted pro hac vice/GA Bar No. 957861)  
303 Peachtree Street, Suite 5300  
Atlanta, Georgia 30308  
Telephone: (404) 527-4000  
Facsimile: (404) 527-4198  
Email: uchenna.ekuma-nkama@dentons.com

FRITZ, BYRNE, HEAD & GILSTRAP,  
PLLC

Lisa C. Fancher  
(TX Bar. No. 06800275)  
221 West Sixth Street, Suite 960  
Austin, Texas 78701  
Telephone: (512) 476-2020  
Facsimile: (512) 477-5267  
Email: lfancher@fbhg.law

*Attorneys for Plaintiffs and Counter  
Defendants Tanger Management, LLC,  
Tanger Columbus, LLC, and Tanger Houston,  
LLC*

**CERTIFICATE OF SERVICE**

I certify by my signature below that a copy of this motion is being served on the following  
by ECF on this 21st day of June, 2021:

Eric J.R. Nichols  
[eric.nichols@butlersnow.com](mailto:eric.nichols@butlersnow.com)  
Christopher Cowan  
[chris.cowan@butlersnow.com](mailto:chris.cowan@butlersnow.com)  
BUTLER SNOW LLP  
1400 Lavaca Street, Suite 1000  
Austin, Texas 78701

Jeremy Heep  
[jeremy.heep@troutman.com](mailto:jeremy.heep@troutman.com)  
Courtney A. Munnings  
[courtney.munnings@troutman.com](mailto:courtney.munnings@troutman.com)  
Karli Cozen  
[karli.cozen@troutman.com](mailto:karli.cozen@troutman.com)  
TROUTMAN PEPPER HAMILTON SANDERS LLP  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103-2799

*Attorneys for Haggar Direct, Inc. and Haggar Clothing Co.*

/s/ Uchenna Ekuma-Nkama  
Uchenna Ekuma-Nkama